

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (CGM) SIPA Liquidation (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC and the Chapter 7 Estate of Bernard L. Madoff, Plaintiff, v. SIX SIS AG, Defendants.	Adv. Pro. No. 12-01195 (CGM) Oral Argument Requested

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant Six Sis AG's Motion to Dismiss the Amended Complaint in the above-captioned action, the Declaration of dated as of the date hereof and exhibits thereto, and all prior pleadings and proceedings herein, Defendant Six Sis AG ("Defendant") will move this Court for an order dismissing the Amended Complaint filed by Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, made applicable here by Rule 7012 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Stipulation and Order, entered on June 30, 2022, all papers responsive to Defendant's Motion to Dismiss the Amended Complaint shall be served and filed no later than September 9, 2022, and all reply papers in further support of Defendant's Motion to Dismiss the Amended Complaint shall be served and filed no later than October 10, 2022.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, Defendant does not consent to the entry of final orders or judgment by this Court.

Dated: July 8, 2022
New York, New York

/s/ Andreas Frischknecht
Chaffetz Lindsey LLP

1700 Broadway
33rd Floor
New York, New York 10019
Telephone: (212) 257-6960
Facsimile: (212) 257-6950
Andreas Frischknecht
Erin Valentine
Andreas.Frischknecht@chaffetzlindsey.com
Erin.Valentine@chaffetzlindsey.com

Attorneys for SIX SIS AG